

CARLSON & JAYAKUMAR
ATTORNEYS AT LAW*

KEITH W. CARLSON, PARTNER
MICHAEL J. SCHROEDER, OF COUNSEL

JEHAN N. JAYAKUMAR, PARTNER

November 13, 2007

BY EMAIL & FACSIMILE

Chairman Ross Johnson
Commissioner Eugene Huguenin
Commissioner Ray Remy
Commissioner Robert Leidigh
Commissioner Tim Hodson
Fair Political Practices Commission
428 J Street, Suite 620
Sacramento, CA 95814

Re: Agenda Item 14

Dear Chairman Johnson and Commissioners:

Thank you for the opportunity to comment on the current staff version of proposed Regulation 18530.31.

The regulation will substantially reduce all-purpose (state candidate support) funds available to state political parties and county central committees to support state candidates. There has been absolutely no evidence of abuse related to political party fundraising costs. Since political parties have been raising funds for over six years under the Prop 34 rules with no evidence of abuse, the FPPC hasn't carried its burden to justify this or any regulation.

The FPPC staff has offered no convincing reason why the 85303 provisions allow it to apply limits to fundraising expenses. Government Code section 85303, subdivisions (a) and (b), apply limits to contributions raised to support state candidates. Government Code section 85303, subdivision (c), says there are no limits on contributions raised for all other purposes. The common sense and correct reading of these related provisions is that fundraising expenses are covered by Government Code section 85303, subdivision (c), and not subdivisions (a) and (b).

The legislative history of Prop 34 contains nothing to justify subjecting fundraising expenses to limits. The FPPC staff has attempted to create an "anti-circumvention" rationale for the rule that ignores this crucial legal point: Proposition 34 says political parties are part of the

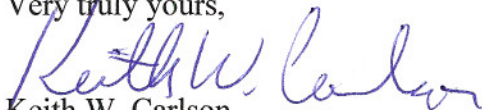
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solution, not part of the problem of the potential or actual corruption of candidates by large campaign contributions. (See findings and purposes of Proposition 34, November 2000 State Ballot Pamphlet, Text of Measure).

I urge the Commission to rewrite the language or adopt the version of the regulation proposed by Charles H. Bell, Jr. and the Sutton Law Firm in their written comments.

Very truly yours,



Keith W. Carlson

Treasurer

California Republican Party